

REMARKS

This Amendment is being filed in response to the Final Office Action mailed June 27, 2008, which has been reviewed and carefully considered. Reconsideration and allowance of the present application in view of the remarks to follow are respectfully requested.

In the Final Office Action, claims 1-8 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 5,757,345 (Sheridon) in view of U.S. Patent No. 6,911,132 (Pamula). Claims 9-11 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Sheridan and Pamula in view of U.S. Patent No. 6,603,344 (Kawanami). Further, claims 12-14 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Kawanami in view of Pamula. It is respectfully submitted that claims 1-14 are patentable over Sheridan, Pamula and Kawanami for at least the following reasons.

As correctly noted on pages 3 and 9 of the Final Office Action, Sheridan and Kawanami do not teach or suggest "retaining a current state by applying a potential to the retain electrode in

relation to the counter electrode and removing any potential from the address electrode in relation to the counter electrode," as recited in independent claim 12. Pamula is cited in an attempt to remedy the deficiencies in Sheridan and Kawanami.

Pamula is directed to an apparatus for manipulating droplets by electrowetting. The Pamula apparatus includes several electrodes, such as three or four electrodes, as recited on column 7, line 53 and column 8, line 28. The electrodes are sequentially activated and de-activated to move droplets, e.g., to separate or split a droplet into two droplets, merge two droplets into one, mix droplets, spread droplets, rotate them and so on.

Pamula specifically recites on column 9, lines 1-2:

The bias on the first electrode is then removed to move the droplet away from the first electrode. (Emphasis added)

Similarly, Pamula specifically recites on Column 16, lines 37-40:

Subsequent activation of control electrode E_3 , followed by removal of the voltage potential at control electrode E_2 , causes droplet D to move onto control electrode E_3 as shown in FIG. 4C. (Emphasis added)

Thus, any removal of a voltage potential from an electrode

causes droplets to move.

In stark contrast, the present invention as recited in independent claim 1, and similarly recited in independent claim 12, amongst other patentable elements recites (illustrative emphasis provided):

wherein a current state is retained by applying a potential to the retain electrode in relation to the counter electrode and removing any potential from the address electrode in relation to the counter electrode.

Retaining a current state by removing any potential from the address electrode is nowhere taught or suggested in Sheridan, Pamula, Kawanami, alone or in combination. Instead of retaining a current state by removing potential from an electrode, Pamula discloses moving a droplet by removing potential from an electrode, which teaches away from retaining a current state by removing any potential from an electrode, as recited in independent claims 1 and 12.


Accordingly, it is respectfully submitted that independent claims 1 and 12 are allowable, and allowance thereof is respectfully requested. In addition, it is respectfully submitted that claims 2-11 and 13-14 should also be allowed at least based on

their dependence from independent claims 1 and 12.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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August 22, 2008

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